

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE**

JERRY THOMAS,	)	CIVIL ACTION NO. 3:20-CV-358
	)	JURY DEMAND
Plaintiff,	)	
	)	
v.	)	
	)	
HEALTHCARE REVENUE	)	
RECOVERY GROUP, LLC,	)	
	)	
Defendant.	)	

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**CONSENT MOTION FOR EXTENSION OF TIME TO FILE A RESPONSIVE PLEADING**

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COME NOW, Plaintiff and Defendant Healthcare Revenue Recovery Group, LLC (“Defendant”) and file this *Consent Motion for Extension of Time to File a Responsive Pleading* and would respectfully show the Court the following:

The current deadline to file a response is September 17, 2020. Defendant’s counsel has conferred with counsel for Plaintiff and Plaintiff is agreeable to an extension of the deadline for Defendant to file a responsive pleading through and including September 27, 2020 so that the parties may further explore the possibility of reaching an early resolution of this matter.

WHEREFORE, Plaintiff and Defendant jointly request this Court to enter an Order extending the deadline for Defendant to file a responsive pleading to Plaintiff’s Complaint through and including September 27, 2020.

A Proposed Order is attached hereto.

DATED: September 17, 2020

Respectfully submitted,

GORDON REES SCULLY MANSUKHANI, LLP

/s/Julie-Karel Elkin

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Attorney for Plaintiff  
Jerry Thomas

#### **CERTIFICATE OF SERVICE**

I, Heather M. Gwinn Pabon, do hereby certify that on September 17, 2020, I did cause a true and correct copy of the within *CONSENT MOTION FOR EXTENSION OF TIME TO FILE A RESPONSIVE PLEADING* to be filed and served electronically on all counsel of record, whom are indicated below, via CM/ECF:

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Signed: /s/Julie-Karel Elkin  
Julie-Karel Elkin